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ATTORNEYS FOR REFLEX MEDIA, INC.

**UNITED STATES DISTRICT COURT
DISTRICT OF CALIFORNIA, CENTRAL DISTRICT**

REFLEX MEDIA, INC., *et al.*

Plaintiff,

vs.

MARIA DEL MAR MARTINEZ
SANCHEZ, *et al.*,

Defendants.

Case No. 2:17-cv-00491 (FMO) JPR

**REFLEX MEDIA'S FIRST SET OF
SPECIAL INTERROGATORIES TO
DEFENDANTS MARIA DEL MAR
MARTINEZ and FDS SOLUTIONS
LIMITED**

Hon. Fernando M. Olguin

PROPOUNDING PARTY: REFLEX MEDIA, INC.

RESPONDING PARTY: MARIA DEL MAR MARTINEZ SANCHEZ and FDS
SOLUTIONS LIMITED

SET: ONE

Under and by virtue of Rule 33 of the Federal Rules of Civil Procedure, Plaintiff Reflex Media, Inc., hereby requests that Defendants MARIA DEL MAR MARTINEZ SANCHEZ and FDS SOLUTIONS LIMITED respond to the following special interrogatories within thirty days from the date indicated on the Certificate of Service attached hereto.

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DEFINITIONS AND INSTRUCTIONS

1. The term “REFLEX” shall mean Plaintiff Reflex Media, Inc.

2. The terms “DEFENDANTS,” “YOU” or “YOUR” shall mean Defendants MARIA DEL MAR MARTINEZ SANCHEZ and FDS SOLUTIONS LIMITED, unless expressly stated otherwise, and their present and former employees, agents, representatives, attorneys, and any other PERSONS acting on its behalf.

3. The term “SANCHEZ” shall mean Defendant Maria Del Mar Martinez Sanchez.

4. The term “FDS SOLUTIONS” shall mean Defendant FDS SOLUTIONS LIMITED.

5. The term “SEEKING ARRANGEMENT” shall mean www.SeekingArrangement.com.

6. The term “TRADEMARK” shall mean Trademark Registration No. 3,377,772.

7. The term “WEBSITE” or “WEBSITES” shall mean, individually and/or collectively, www.fndrtsmt.com or www.findyourtruesoulmate.com.

8. The term “PERSON” or “PERSONS” shall mean and include natural persons, firms, partnerships, corporations, limited liability companies, joint ventures or any other form of business or legal entity.

9. The term “PHISHING EMAIL” shall mean the email attached as Exhibit 1 to the Complaint.

10. The term “DOCUMENT” shall include without limitation, the original or absent any original, a copy, of intra-office or inter-office memoranda, COMMUNICATIONS, letters, emails, text messages, written materials, reports, records, personal calendars and diaries, minutes, contracts, memoranda or electronic records of telephonic or personal communications, tape recordings, films, negatives, stenographic

1 notes, computer-stored data or databases, other data or information compilations from
2 which information can be obtained, and any written, printed, recorded, or tangible matter
3 of any character in the possession custody, or control of YOU or YOUR attorneys, agents,
4 or other PERSONS under YOUR control. It shall also include non-identical copies
5 (whether different from the originals because of any alterations, notes, comments or other
6 material contained therein or attached thereto or otherwise), and drafts of all written,
7 printed, recorded or graphic matter of every kind and description, together with any
8 attachment thereto or enclosure within in any way relating to or referring to or concerning
9 the subject matter of the request, whether inscribed by hand or by mechanical, electronic,
10 microfilm, photographic, or other means, as well as phonic or visual reproductions.

11 11. The term “COMMUNICATIONS” means every exchange of information of
12 any nature, whether oral or written, from one PERSON to another, and any evidence of
13 such exchange, including, but not limited to, any telephone calls, discussions, conferences,
14 correspondence, memorandum, electronic mail, messages, notes or logs of meetings,
15 diaries, daily calendars, or other records of exchanges between or among any PERSONS.

16 12. All other terms used herein are to be construed and used as defined as set forth
17 in the Complaint, or if not used or defined therein, such terms shall be given their ordinary
18 usage.

19 13. Where an individual request calls for an answer or response that involves more
20 than one part, each part of the answer or response shall be clearly set out so that it is
21 understandable.

22 14. To the extent YOU may lack the knowledge or ability to respond to any
23 request or part thereof completely, state the reason(s) why YOU are unable to answer
24 completely and provide the most complete response to which YOU are capable.

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26
27 **SPECIAL INTERROGATORIES**
28

INTERROGATORY NO. 1:

Identify when DEFENDANTS acquired the following domains:

- www.findyourtruesoulmate.com
- www.fndrsmt.com

INTERROGATORY NO. 2:

List every home and work address (physical address) used by SANCHEZ for the past five years.

INTERROGATORY NO. 3:

Identify every time DEFENDANTS have been accused of fraudulent billing.

INTERROGATORY NO. 4:

Describe the nature of all products and/or services offered through www.findyourtruesoulmate.com.

INTERROGATORY NO. 5:

Describe the nature of all products and/or services offered through www.fndrsmt.com.

INTERROGATORY NO. 6:

List each website for whom www.fndrsmt.com provides payment processing or payment-related services.

INTERROGATORY NO. 7:

Please describe all information DEFENDANTS possess concerning the use and/or ownership of the following email addresses:

- ceoseekingarrangement@gmail.com;
- seekingmanagementceo@gmail.com

INTERROGATORY NO. 8:

Identify any relationship DEFENDANTS have, or have had, with respect to any of the following companies:

- Handle Marketing Limited

1 - Ixion Creations Limited

2 **INTERROGATORY NO. 9:**

3 Identify all other websites owned/operated by DEFENDANTS from 2016 to the
4 present.

5 **INTERROGATORY NO. 10:**

6 Describe all information DEFENDANTS' possess concerning the origin of the
7 PHISHING EMAIL.

8 **INTERROGATORY NO. 11:**

9 Identify any relationship DEFENDANTS have ever had with REFLEX and/or
10 SEEKING ARRANGEMENT.

11 **INTERROGATORY NO. 12:**

12 Identify every other online dating website affiliated with DEFENDANTS.

13 **INTERROGATORY NO. 13:**

14 Provide a list of every email address that was sent a copy of the PHISHING EMAIL.

15 **INTERROGATORY NO. 14:**

16 List the officers and directors of FDS SOLUTIONS from January 1, 2016, to the
17 present.

18 **INTERROGATORY NO. 15:**

19 Identify whether SANCHEZ has ever been a member of SEEKING
20 ARRANGEMENT, and if so, the email address(es) given when joining the website.

21 **INTERROGATORY NO. 16:**

22 Identify all email addresses used by SANCHEZ between January 1, 2016, and the
23 present and the purpose(s) of each email address (business, personal, etc.)

24 **INTERROGATORY NO. 17:**

25 Identify any relationship DEFENDANTS have, or have had, with respect to any of
26 the following websites:

27 - www.campleasures.com
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- www.joincheckout.com
- www.localsexfriends.com
- www.safedatingcafe.com
- www.oversinglelife.com
- www.uberhorny.com
- www.LSTFL.com
- www.SFEGAF.com
- www.VESGFE.com

INTERROGATORY NO. 18:

Identify the date(s) each WEBSITE was launched.

INTERROGATORY NO. 19:

Identify the circumstances through which DEFENDANTS first became aware of each of REFLEX, SEEKING ARRANGEMENT, and/or the TRADEMARK.

INTERROGATORY NO. 20:

Identify every PERSON known to DEFENDANTS to be, at any time, a member of SEEKING ARRANGEMENT.

INTERROGATORY NO. 21:

Identify every Internet domain name owned by DEFENDANTS from January 1, 2016, to the present.

INTERROGATORY NO. 22:

For all responses to REFLEX'S Requests for Admission that are not an unqualified admission, state all facts supporting YOUR response.

DATED: July 12, 2017

/s/ Mark L. Smith
Mark L. Smith
Counsel for Reflex Media, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing **REFLEX MEDIA'S FIRST SET OF SPECIAL INTERROGATORIES TO DEFENDANTS MARIA DEL MAR MARTINEZ and FDS SOLUTIONS LIMITED** was served on the person(s) identified below on July 12, 2017, via email:

Allen B. Grodsky
allen@grodsky-olecki.com
Grodsky & Olecki LLP
2001 Wilshire Boulevard
Suite 210
Santa Monica, CA 90403

/s/ Jacob L. Fannesbeck